

## *REMARKS*

Applicants thank the Examiner for the very thorough consideration given the present application.

Claims 1-20 are now present in this application. Claims 1, 8 and 14 are independent.

Amendments have been made to the Abstract of the Disclosure and specification, claims 8-20 have been added, and claims 1-7 have been amended. Reconsideration of this application, as amended, is respectfully requested.

### *I. Priority Under 35 U.S.C. § 119*

Applicants thank the Examiner for acknowledging Applicants' claim for foreign priority under 35 U.S.C. § 119, and receipt of the certified priority document.

### *II. Objection to the Drawings*

The Examiner has objected to Figure 1 of the drawings, and suggests the use of the label --Prior Art-- instead of "Conventional Art".

Applicants respectfully submit that the suggestion in MPEP § 608.02(g) of the use of the phrase --Prior Art-- does not exclude the use of alternate

phrases, for example, "Background Art" and "Conventional Art". These alternative phrases may be found in many U.S. Patents issued today. The intent of MPEP § 608.02(g) is to distinguish Applicants' invention from that which is not Applicants' invention. If a drawing figure illustrates only material which is known to be statutory prior art to the invention, then the use of the phrase --Prior Art-- in the drawing figure would be proper. However, if it is not clear whether such material is statutory prior art, then the use of the phrase --Prior Art-- in the drawing figures would not be proper, and a label such as "Background Art" or "Conventional Art" would be more appropriate.

Nevertheless, in order to advance prosecution and overcome this objection, Applicants are concurrently submitting a Replacement Sheet wherein "Conventional Art" has been changed to --Background Art--. Applicants submit that the label "Background Art" meets the criteria of MPEP § 608.02(g) and is sufficient to distinguish Applicants' invention from that which is not Applicants' invention. Accordingly, reconsideration and withdrawal of this objection are respectfully requested.

### *III. Specification and Abstract Objections*

The Examiner has objected to the specification and Abstract because of minor informalities. In order to overcome these objections, Applicants have amended the specification and Abstract in order to correct the deficiencies

pointed out by the Examiner. Reconsideration and withdrawal of these objections are respectfully requested.

#### *IV. Rejection Under 35 U.S.C. § 102*

Claims 1 and 5 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Massoudi. This rejection is respectfully traversed.

A complete discussion of the Examiner's rejection is set forth in the Office Action, and is not being repeated here.

While not conceding the appropriateness of the Examiner's rejection, but merely to advance prosecution of the instant application, Applicants respectfully submit that independent claim 1 has been amended to recite a combination of steps in an error correction encoding method conducted in a digital data writing apparatus when recording data to a storage medium, including appending outer parity of a predetermined size and inner parity of a predetermined size to each column and row of each of said plurality of data blocks, respectively, thereby forming one ECC (Error Correction Code) block to perform an error correction on the basis of the one ECC block. Applicants respectfully submit that this combination of steps as set forth in independent claim 1 is not disclosed or made obvious by the prior art of record, including Massoudi.

Applicants respectfully submit that Massoudi discloses error detection

and correction in an ECC block data without waiting for an entire ECC block to be assembled in a buffer, and error detection and correction with less buffer bandwidth (col. 3, lines 54 to 60). In particular, the Examiner indicates "each ECC data block is defined as a two dimensional block of a plurality of columns and rows" (col. 4, lines 7 to 8). Massoudi does not disclose Applicants' claimed invention, which is to form new one ECC block from two ECC blocks, and to perform an ECC process in high density storage media.

Applicants respectfully submit that the combination of steps as set forth in independent claim 1 is not disclosed or made obvious by the prior art of record, including Massoudi, for the reasons explained above. Accordingly, reconsideration and withdrawal of this rejection are respectfully requested.

With regard to dependent claim 5, Applicants submit that claim 5 depends directly from independent claim 1 which is allowable for the reasons set forth above, and therefore claim 5 is allowable based on its dependence from claim 1. Reconsideration and allowance thereof are respectfully requested.

#### *V. Allowable Subject Matter*

The Examiner states that claims 2-4 and 6-7 would be allowable if rewritten to overcome the rejection(s) under 35 U.S.C. § 112, 2<sup>nd</sup> Paragraph.

Applicants thank the Examiner for the early indication of allowable subject matter in this application. Applicants note that claims 2-4 and 6-7 have not

been rejected under 35 U.S.C. § 112, 2<sup>nd</sup> Paragraph. In addition, claims 2-4 and 6-7 have not been rewritten in independent form at this time, since it is believed that independent claim 1 from which these claims depend is allowable.

#### *VI. Claims 8-20*

Claims 8-20 have been added for the Examiner's consideration.

Independent claim 8 recites a combination of steps in an error correction encoding method for a storage medium including limitations taken from objected-to allowable claim 2. Accordingly, Applicants respectfully submit that this combination of steps as set forth in independent claim 8 is allowable over the prior art of record, along with dependent claims 9-13.

Independent claim 14 recites a combination of steps in an error correction encoding method, including arranging a sequential input digital data so as to form a pair of data blocks of a predetermined matrix form, said pair of data blocks being formed sequentially and each data block having a size of 172×192 bytes; appending an outer parity of a predetermined size and an inner parity of a predetermined size to each column and row of each data block, respectively; and combining each data block in where the outer parity and the inner parity are appended, thereby forming one ECC (Error Correction Code) block to perform an error correction on the basis of the one ECC block. Applicants respectfully submit that this combination of steps as set forth in independent claim 14 is not

disclosed or made obvious by the prior art of record, and is therefore allowable, along with dependent claims 15-20.

Consideration and allowance of claims 8-20 are respectfully requested.

### *VII. Additional Cited References*

Since the remaining references cited by the Examiner have not been utilized to reject the claims, but have merely been cited to show the state of the art, no comment need be made with respect thereto.

### *VIII. Conclusion*

All of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding rejections and that they be withdrawn. It is believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone James T. Eller, Jr., Registration No. 39,538, at (703) 205-8000, in the Washington, D.C. area.

Prompt and favorable consideration of this Amendment is respectfully requested.

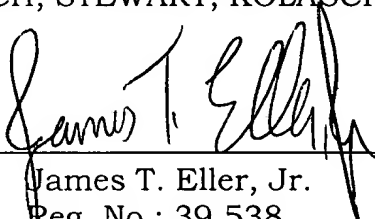
Applicants respectfully petition under the provisions of 37 C.F.R. § 1.136(a) and § 1.17 for a three-month(s) extension of time in which to respond to the Examiner's Office Action. The Extension of Time Fee in the amount of **\$950.00** is attached hereto.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,

BIRCH, STEWART, KOLASCH & BIRCH, LLP

By

  
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Attachment: Replacement Drawing Sheets  
Abstract of the Disclosure